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**David L. Meier**  
Director  
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June 11, 1996

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JUN 11 1996

Mr. William F. Caton, Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D. C. 20554

In the Matter of:

Implementation of the Local Competition  
Provisions in the Telecommunications Act  
of 1996:

Telecommunications Carriers' Use of  
Customer Proprietary Network Information  
and Other Customer Information

DOCKET FILE COPY ORIGINAL

CC Docket No. 96-115

Dear Mr. Caton:

Enclosed are an original and eleven copies of the Comments of Cincinnati Bell Telephone Company in the above referenced proceeding. A duplicate original copy of this letter and attached Comments is also provided. Please date stamp this as acknowledgment of its receipt and return it. Questions regarding these Comments may be directed to me at the above address or by telephone on (513) 397-1393.

Sincerely,

David L. Meier

Enclosure

cc: Janice Myles (Paper and disk copy)  
International Transcription Services, Inc

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**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

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JUN 11 1996

In the Matter of )  
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Implementation of the )  
Telecommunications Act of 1996 )  
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Telecommunications Carriers' Use )  
of Customer Proprietary Network )  
Information and Other Customer )  
Information )

CC Docket No. 96-115

**COMMENTS OF CINCINNATI BELL TELEPHONE COMPANY**

**SUMMARY**

Cincinnati Bell Telephone Company ("CBT"), an independent, mid-size local exchange carrier, submits these comments in response to the Commission's proposed rules released May 17, 1996 to implement Section 702 of the Telecommunications Act of 1996 (the "Act"). In this proceeding specifically, the Commission must strike an appropriate balance between the desire to protect the privacy interests of consumers and the need to allow carriers sufficient access to their customers' information to promote the development of a competitive market, as envisioned by the Act.

CBT asserts that the purpose of the Act, to promote a competitive environment, as well as the public interest, would best be served by a broader interpretation of the meaning of "telecommunications service" for the purpose of implementing Section 222. CBT submits that "telecommunications service" under the Act can and should be interpreted by the Commission to include the total traditional telecommunications service package.

CBT believes that customers should receive written notification of their rights regarding a telecommunications carriers use of CPNI. If the carrier, despite a good faith effort, is unable to make contact with the customer, then consent to use that customer's CPNI should be implied by the customer's failure to respond and by the business/customer relationship. Further, in order to minimize the level of intrusiveness on customers, CBT asserts that the customer authorization for the use of CPNI, once obtained, should remain valid until the customer notifies the carrier that such CPNI use is no longer authorized

CBT believes that while customers are not overly concerned about the use of CPNI by their telecommunications provider, they are extremely concerned about the release of this information to third parties.<sup>1</sup> CBT asserts, therefore, that Section 222(c)(2) of the Act requiring affirmative written customer authorization for the disclosure of CPNI to third parties be strictly enforced.

CBT agrees with the Commission tentative conclusion that it should not now specify safeguard requirements for telecommunications carriers, other than the BOCs, AT&T and GTE, to protect against unauthorized access to CPNI.<sup>2</sup> CBT further submits that none of the safeguard requirements currently imposed on the BOCs, AT&T and GTE should be imposed on other telecommunications carriers

CBT asserts that a LEC which makes aggregate CPNI available to others must be able to recover all costs involved in obtaining the aggregate data. Therefore, LECs should be allowed to establish a rate for the data which provides for such cost recovery, so long as the rate

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<sup>1</sup> NPRM at ¶ 34.

<sup>2</sup> NPRM at ¶ 36.

is reasonable and nondiscriminatory. CBT further submits that the Commission should adopt no requirement that LECs have an obligation to notify others of the availability of aggregate CPNI data. Rather, the Commission should specify that LECs need only provide aggregate CPNI data upon request.

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**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
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Implementation of the	)	
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Information and Other Customer	)	
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**COMMENTS OF CINCINNATI BELL TELEPHONE COMPANY**

**I. INTRODUCTION**

Cincinnati Bell Telephone Company ("CBT"), an independent, mid-size local exchange carrier, submits these comments in response to the Commission's proposed rules released May 17, 1996 to implement Section 702 of the Telecommunications Act of 1996 (the "Act").<sup>3</sup> Section 702 of the Act added a new Section 222 to the Communications Act of 1934 which sets forth certain restrictions on the use of customer proprietary network information ("CPNI") obtained by telecommunications carriers in providing telecommunications services, as well as certain requirements on the availability of subscriber list information.

The intent of Congress in enacting this legislation was to benefit consumers. Decisions made in this proceeding will have a profound impact on consumers, the development of competition in the telecommunications industry, and the rights and obligations of service

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<sup>3</sup> In the Matter of Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, CC Docket No. 96-115, released May 17, 1996. See also, Telecommunications Act of 1996, Pub. L. 104-104, § 222.

providers. Therefore, the Commission, in this and other proceedings, must consider the impact of its decisions on all consumers, not just those served by large telecommunications carriers or those served by new entrants. Failure to adequately address the special concerns of smaller companies and the markets they serve would have a negative impact on their customers and will not produce the benefits of the competitive environment envisioned by the Act.

In this proceeding specifically, the Commission must strike an appropriate balance between the desire to protect the privacy interests of consumers and the need to allow carriers sufficient access to their customers' information to promote the development of a competitive market, as envisioned by the Act. If the Commission through this proceeding promulgates rules which are overly protective of customer information, then the result will be the erection of unnecessary barriers to the development of a competitive market in which competitors are free to offer customers a broad range of services. Further, an overly protective approach to CPNI will deny customers the efficiencies which should result from a competitive market, in that they will be denied access to the benefits flowing from the developing competitive markets. The Commission, therefore, must adopt rules through this proceeding that expands competitive markets for telecommunications service, while providing reasonable protection for customer information that is obtained through the provision of that service.

In order for rules adopted through this proceeding to enhance competitive markets, they must recognize and take into account existing business/customer relationships and reasonable business practices. Further, rules which restrict the use of CPNI must be fully reciprocal and must treat all telecommunications carriers equally. Rules governing the use of CPNI by telecommunications carriers must be uniform and national in scope, in order to ensure that

differing rules related to the use of CPNI do not give particular carriers a competitive advantage over others.<sup>4</sup>

## II. DISCUSSION

### A. "Telecommunications Services" Should Be Defined In A Manner Which Is Consistent With Existing Business Relationships And Customer Expectations.

In its NPRM, the Commission reaches the tentative conclusion that Section 222 should be reasonably interpreted as distinguishing among telecommunications services based on "traditional" service distinctions, so that the following are treated as distinct telecommunications services:

- local (including short-haul toll)
- interexchange (including interstate, intrastate, and international long distance offerings, as well as short-haul toll)
- commercial mobile radio services (CMRS).<sup>5</sup>

CBT asserts that the purpose of the Act, to promote a competitive environment, as well as the public interest, would best be served by a broader interpretation of the meaning of "telecommunications service" for the purpose of implementing Section 222.

CBT submits that "telecommunications service" under the Act can and should be interpreted by the Commission to include the total traditional telecommunications service package. Such an interpretation would be consistent with current business practice and would

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<sup>4</sup> NPRM at ¶ 17.

<sup>5</sup> NPRM at ¶ 22.

best serve the customers of service providers by ensuring the full benefits of a competitive market.

Customers, particularly business customers, who have an established relationship with a carrier demand and expect that their carrier will use all the information which they have available, including CPNI, to provide information or offer products which will improve the service which the customer receives. As a recent CBT study indicates, customers also desire to purchase a variety of products from a single carrier,<sup>6</sup> and often seek to obtain discounts from purchasing a package of products from an individual carrier. In order to meet this demand, carriers will package products together in a manner which will offer customers additional benefits than might be available from separate suppliers. Carriers will be frustrated in their attempt to provide these benefits to their customers should the Commission adopt a restrictive interpretation of "telecommunications service" for the purposes of Section 222. Furthermore, such a restrictive interpretation will only serve to confuse customers, who do not always understand arbitrary artificial distinctions between services and providers.

As the competitive market develops, and technologies and services merge and overlap, a restrictive interpretation of "telecommunications service" which focuses on discrete services or products will be impossible to administer and enforce. For example, would wireless service that is used to provide local exchange service be considered "local" or "wireless" service under the Commission's interpretation of "telecommunications service"? Likewise, as a single carrier

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<sup>6</sup> Attached to these comments as Appendix A is a report summarizing the results of a study conducted on behalf of CBT by Aragon Consulting Group. The report indicates that almost one-half of all respondents surveyed (47.1%) strongly prefer a single provider for telephone services.

potentially becomes the provider of local, toll, wireless, CPE and enhanced services to a customer, information which is gathered "solely by virtue of the carrier customer relationship" will become increasingly difficult to classify as related to a particular type of service. Such a situation would render the Commission's classification of three discrete "traditional" telecommunications services meaningless and unrealistic.

With the advent of a competitive market, many diverse companies, e.g. cable television providers, energy utility companies, or credit card companies, may seek certification to provide telecommunications service. These new entrants will be in a position to use information about their current customers, obtained as a result of the business/customer relationship, to market their telecommunications products without the restrictions imposed under Section 222 of the Act. Rules constructing artificial categories of "telecommunications service" which severely restrict telecommunications carriers from using CPNI to offer new products or information to their customers place these carriers at a competitive disadvantage to the new entrants.

While CBT certainly urges the Commission to adopt the interpretation of "telecommunications service" proposed by CBT above, CBT asserts that the interpretation offered by the Commission in its NPRM for three discrete "telecommunications services" should be the most restrictive interpretation considered by the Commission in this proceeding. The Commission's interpretation of the meaning of "telecommunications service" for the purpose of implementing restrictions on the use of CPNI under Section 222 of the Act must be flexible enough to allow the full development of the competitive market for telecommunications service envisioned by the Act. CBT submits that by adopting an overly restrictive interpretation of "telecommunications service," the Commission would, in effect, place one group of providers

in a competitively advantageous position over those who have traditionally provided such services.

**B. "Services Necessary To, Or Used In, The Provision Of Such Telecommunications Service" For The Purposes Of Section 222(c)(1)(b) Must Be Interpreted In A Broad And Flexible Manner.**

Even if the Commission adopts an interpretation of "telecommunications service" which employs three discrete categories of telecommunications services, CBT asserts that the Commission should conclude that "services necessary to, or used in, the provision of such telecommunications service" must be interpreted in a broad and flexible manner to allow carriers to provide beneficial services to their customers.<sup>7</sup> CBT asserts that the interests of customers will be best served if the Commission concludes, for example, that CPE and enhanced services are necessary to, or used in, the provision of telecommunications service for the purposes of using CPNI derived from the telecommunications service to make such services available to customers. Such an interpretation is logical, in that it reflects the business reality. For example, cellular service is hard to envision without the concomitant CPE. Also, certain features, such as Caller ID, may be used to enhance local, long distance or wireless service, which would be of benefit to customers.

In addition, the Commission seeks comment on whether Section 222(d)(1) "permits carriers, without prior authorization, to use a customer's CPNI derived from the provision of one telecommunications service to perform installation, maintenance, and repair for any telecommunications service to which that customer subscribes" or, in the alternative, whether

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<sup>7</sup> NPRM at ¶¶ 25-26.

installation, maintenance, and repair qualify as "services necessary to, or used in, the provision of, such telecommunications service" under Section 222(c)(1)(B).<sup>8</sup> CBT asserts that installation, maintenance, and repair are clearly within the scope of Section 222(c)(1)(B) as "services necessary to, or used in, the provision of, such telecommunications service." Therefore, a telecommunications carrier should be able to use CPNI derived from a telecommunications service to perform installation, maintenance, and repair for any telecommunications service to which that customer subscribes. A more restrictive interpretation by the Commission would inconvenience customers by making necessary installation, maintenance, and repair more difficult and burdensome for both the carrier and the customer.

**C. Customer Notification Of CPNI Rights / Prior Authorization**

In determining the appropriate method of notification to customers of their rights concerning CPNI and obtaining authorization for the use of CPNI by a carrier, the Commission again must strike an appropriate balance between the desire to protect privacy interests and the need to allow carriers sufficient access to CPNI to promote the development of a competitive market.<sup>9</sup> CBT submits that only a relatively small number of customers are concerned about how a carrier will make use of certain CPNI, such as number of access lines or the custom calling services to which they subscribe, to make the customer aware of new services or information. CBT has historically received relatively few contacts from customers concerned about the use of CPNI, even with no restrictions on its use. On the other hand, CBT has been

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<sup>8</sup> NPRM at ¶ 26.

<sup>9</sup> NPRM at ¶¶ 27-33.

informed by its customers of their desire to be kept aware of service offerings which will benefit them.<sup>10</sup>

CBT believes that customers should receive written notification of their rights regarding a telecommunication's carriers use of CPNI. Authorization for a carrier's use of CPNI from new customers should be permitted to be obtained verbally from the customer at the time the service is established. In order to make use of CPNI from existing customers, a carrier should be required to make a good faith effort to obtain either a verbal or written authorization from these existing customers. If the carrier, despite a good faith effort, is unable to make contact with the customer, then consent to use that customer's CPNI will be implied by the customer's failure to respond and by the business/customer relationship. Further, in order to minimize the level of intrusiveness on customers, CBT asserts that the customer authorization for the use of CPNI, once obtained, should remain valid until the customer notifies the carrier that such CPNI use is no longer authorized

While requiring written notification and a good faith effort to obtain authorization may place a greater burden on the carrier than some recommendations which the Commission may receive in this proceeding, CBT believes that this procedure reaches a balance between the customer's interest in protecting CPNI and the carrier's need to use this information to inform customers of new offerings which may be of benefit to them.

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<sup>10</sup> See report, attached hereto as Appendix A, summarizing Aragon Consulting Group study. The report indicates that the vast majority of respondents surveyed (81.5%) want to be kept aware of the services CBT offers.

#### **D. Disclosure Of CPNI To Third Parties**

As supported by the study commissioned by CBT to address questions raised in this NPRM,<sup>11</sup> CBT asserts that while customers are not overly concerned about the use of CPNI by their telecommunications provider, they are extremely concerned about the release of this information to third parties.<sup>12</sup> CBT asserts, therefore, that Section 222(c)(2) of the Act requiring affirmative written customer authorization for the disclosure of CPNI to third parties be strictly enforced. However, CBT does not believe that additional safeguards are required to protect customer CPNI from unauthorized disclosure to third parties. CBT asserts that existing state and federal consumer protection statutes, such as the Electronic Communications Privacy Act ("ECPA"), provide adequate protection for consumers' privacy and sufficient penalties for unlawful access.<sup>13</sup>

#### **E. Safeguards For Customer-Restricted CPNI Data**

CBT agrees with the Commission tentative conclusion that it should not now specify safeguard requirements for telecommunications carriers, other than the BOCs, AT&T and GTE, to protect against unauthorized access to CPNI.<sup>14</sup> CBT further suggests that none of the safeguard requirements currently imposed on the BOCs, AT&T and GTE should be imposed on other telecommunications carriers.

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<sup>11</sup> See report summarizing study results attached hereto as Appendix A.

<sup>12</sup> Indeed, the report summarizing the Aragon Consulting Group study (see Appendix A) indicates that almost half the respondents surveyed indicated that they would be extremely concerned about their CPNI being provided to other companies for marketing purposes.

<sup>13</sup> 18 USC § 2703, Pub. L. 99-508.

<sup>14</sup> NPRM at ¶ 36.

In evaluating this issue, the Commission must consider the limited resources of small and mid-size LECs. At the present time, these carriers have no CPNI restrictions, nor any experience in implementing such restrictions. To impose on these small and mid-size carriers the same CPNI safeguard requirements already imposed on the much larger BOCs, AT&T and GTE would be extremely burdensome, in that it would require these smaller carriers to reorganize and retrain personnel and develop expensive modifications in their computer systems.

CBT asserts that restrictions on the use of CPNI is all that is required by the language of Section 222 of the Act. CBT has for years had policies designed to protect customer's CPNI from improper disclosure, because CBT believes that this information is confidential and that customers expect it to be protected. CBT submits that these internal company policies and existing consumer protection laws are adequate to protect customer CPNI from improper access.

**F. Aggregate CPNI**

Section 222(c)(3) of the Act allows telecommunications carriers, other than LECs, to use aggregate CPNI for purposes other than providing telecommunications services.<sup>15</sup> However, under this provision, LECs may use aggregate CPNI for purposes other than providing telecommunications services, so long as the aggregate CPNI is made available to others on reasonable and nondiscriminatory terms and conditions. CBT asserts that a LEC which makes aggregate CPNI available to others must be able to recover all costs involved in obtaining the aggregate data. Therefore, LECs should be allowed to establish a rate for the data which provides for such cost recovery, so long as the rate is reasonable and nondiscriminatory. Further, CBT urges the Commission to adopt an interpretation of the definition of "aggregate

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<sup>15</sup> NPRM at ¶ 37.

CPNI" under the Act which makes it clear that aggregate data includes only raw data, not data than has in any way been enhanced by the LEC.

CBT further submits that the Commission should adopt no requirement that LECs have an obligation to notify others of the availability of aggregate CPNI data.<sup>16</sup> Those who would seek such data are either other telecommunications carriers or sophisticated business customers who have the ability to make themselves aware of the availability of aggregate CPNI data. However, should the Commission require some form of notification of the availability of aggregate data, then the LEC must be able to fully recover the cost associated with the notice through the rates charged for the aggregate data. Further CBT asserts that if such a notification requirement is imposed on LECs by the Commission, LECs are only obligated to give notice of the availability of aggregate data to those with whom they have an interconnection arrangement or who are involved in the telecommunications markets as resellers of telecommunications service

**G. Availability of Subscriber List Information**

Section 222(e) of the Act states that a telecommunications carrier that provides "telephone exchange service" shall provide subscriber list information "gathered in its capacity as a provider of such service on a timely and unbundled basis, under nondiscriminatory and reasonable rates, terms, and conditions, to any person upon request for the purpose of publishing directories in any format." CBT agrees with the Commission's interpretation that this provision applies not only to LECs, but to any carrier which provides telephone exchange service.<sup>17</sup>

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<sup>16</sup> NPRM at ¶ 37.

<sup>17</sup> NPRM at ¶ 43.

Customers currently have access to subscriber directories which include all names, addresses and phone numbers in a market area, with the exception of those subscribers who have requested that their information remain unpublished<sup>18</sup>. CBT asserts that it is in the public interest that these directories remain complete for a given market area, and not become fragmented between service providers in a given market. Therefore, all telecommunications carriers, including IXC's, cable operators, and resellers, must be required to make subscriber list information available for the publishing of a directory.

CBT submits that the provision of subscriber list information to any requesting party must be the result of a negotiated agreement between the parties. Terms, conditions and rates should be reciprocal between all providers. Rates for the available subscriber listings should be the result of negotiations between the parties, and while nondiscriminatory, should reflect the competitive market and be sufficient to ensure that telephone companies that gather and maintain such data are fairly compensated for the value of the data. Contracts negotiated for subscriber listings should clearly restrict the use of such listings to the publication of directories, as required by Section 222(e) of the Act.

Unless otherwise negotiated between the parties, carriers should not be required to provide information in any format other than that utilized by the carrier to produce white page listings. In addition, CBT supports the language of the Act regarding the timing of the availability of these listings, which requires listings to be made available on a nondiscriminatory basis.

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<sup>18</sup> Where a customer chooses to have nonpublished telephone service, the subscriber listing information should not be made available for any type of publishing.

The Commission requests comment on the proper interpretation of "primary advertising classification" as used in Section 222(f)(3) of the Act.<sup>19</sup> CBT asserts that "primary advertising classification" should be interpreted as meaning only the residence/business classification available to the carrier. CBT has no permanent record of "yellow page headings" of its customers, as these are not assigned at the time service is established. Yellow page headings are value that should be added to these subscriber listings by the directory publisher, not by the telecommunications provider.

CBT agrees with the Commission's tentative conclusion that "primary advertising classification" as used in Section 222(f)(3) of the Act is employed differently than the term "advertising" used in Section 274(h)(2)(i).<sup>20</sup> As a result of this interpretation, CBT further agrees with the Commission's conclusion that subscriber list information should not be considered as being within the definition of "electronic publishing."<sup>21</sup>

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<sup>19</sup> NPRM at ¶ 44.

<sup>20</sup> NPRM at ¶ 44.

<sup>21</sup> NPRM at ¶ 44.

### III. CONCLUSION

CBT respectfully requests the Commission to consider these comments as it develops regulations and guidelines related to the statutory provisions of the Act concerning the use of CPNI and subscriber list information.

Respectfully submitted,

FROST & JACOBS

By Jack B. Harrison (cjh)  
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Dated: June 11, 1996

Attorneys for Cincinnati Bell  
Telephone Company

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# MEMO

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To: Dave Meier  
From: Gary Miller  
Subject: Privacy Issues Study  
Date: June 10, 1996

Attached are the data tables generated from the study conducted on behalf of CBT regarding the privacy issues.

We conducted a total of 227 interviews with a random sample of CBT residential customers. The error variance (at a 95 degree confidence level) is plus or minus 6.5 percent.

The following summarizes the findings from this study:

*Question: As you may or may not be aware, a telecommunications act was recently passed that will allow other companies to provide local telephone services. It will also allow Cincinnati Bell Telephone to provide you with a full range of telephone services including local, long distance, cellular service, and telephone equipment.*

*I'd like for you to tell me the degree to which you would prefer a single provider or multiple providers for your telephone services. Please answer using a scale of 1 to 10, with 1 meaning you "strongly prefer multiple providers" and 10 meaning you "strongly prefer to have a single provider."*

- Almost one-half of all respondents (47.1%) strongly prefer a single provider for telephone services (rating of 9 or 10 on a 10-point scale). Only 16.3 percent of the respondents surveyed strongly prefer multiple providers (rating of 1 or 2 on a 10-point scale).

*Question: Many customers have indicated that they would like to be kept aware of the full range of telecommunications, information, and entertainment services that CBT will be able to provide to them. I'm going to read three statements. Please tell me which statement best reflects your opinion.*

1. I want to be advised of all telecommunications, information, and entertainment services offered.
2. I would prefer to be advised only of those that would benefit my household.
3. I do not want to be advised of any services offered.

Dave Meier  
Page 2  
June 10, 1996

- The vast majority of respondents (81.5%) want to be advised of the services that CBT offers. Almost an equal portion want be advised of all services (39.6%), as those who want to be advised of only those services that would benefit their households (41.9%). Less than one-in-five respondents (18.1%) indicate that they do not want to be advised of any services offered.

*Question: Instead of providing information to all customers on all services it offers, CBT could do a better job of customizing the information provided to you about the products and services it offers to your household if CBT could use the information it has about your household already – such as the number of telephone lines you have or the custom calling services to which you subscribe. Would you be concerned about having CBT use this type of information in order to better make you aware of new services or information?*

- A relatively small number of respondents (17.2%) indicate that they would be "extremely concerned" (rating of 9 or 10 on a 10-point scale) about having CBT use the information that they have in order to make them more aware of new services or information. Almost half of the respondents (44.5%) indicate that they would be "not at all concerned" (rating of 1 or 2 on a 10-point scale).

*Question: How concerned would you be if this information was provided to other companies – not CBT – in order for those companies to send you information regarding the products and services that they offer?*

- In sharp contrast, almost half of the respondents surveyed (49.8%) indicate that they would be "extremely concerned" (rating of 9 or 10 on a 10-point scale) with this information being provided to other companies in order for those companies to send them information regarding the products and services that they offer. Almost one-fourth of the respondents, however, indicated that they would be "not at all concerned" (rating of 1 or 2 on a 10-point scale).

Dave, please feel free to call us with any questions or clarifications that you may need. I can be reached on Monday at (314)726-0746. Again, thank you for the opportunity of working with CBT on this important project.

MULTI -- Using a scale of 1 to 10, I'd like for you to tell me the degree to which you would prefer a single provider or multiple providers for your telephone services.

	TOTAL	AGE			HOUSEHOLD SIZE			MARITAL STATUS			EDUCATION			INCOME			GENDER	
		21-35	36-55	56+	1-2	3-4	5+	SINGLE	MARR- IED	DIV/WID SEP.	H.S.	TECH/ ASSOC.	COLL. GRAD+	<\$50K	\$50K- <\$75K	\$75K+	MALE	FEM.
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)	(O)	(P)	(Q)	(R)
TOTAL	227 100.0	43 100.0	86 100.0	92 100.0	128 100.0	64 100.0	30 100.0	30 100.0	151 100.0	38 100.0	80 100.0	47 100.0	91 100.0	95 100.0	29 100.0	17 100.0	77 100.0	150 100.0
<u>Top 2 Box (9-10)</u>	107 47.1	12 27.9	42 48.8 B	50 54.3 B	59 46.1	29 45.3	16 53.3	11 36.7	68 45.0	24 63.2 HI	54 67.5 LM	21 44.7	30 33.0	51 53.7 O	10 34.5	7 41.2	27 35.1	80 53.3 Q
10=Strongly prefer single provider	101 44.5	11 25.6	39 45.3 B	48 52.2 B	56 43.8	27 42.2	15 50.0	11 36.7	64 42.4	22 57.9 hi	51 63.8 LM	20 42.6	28 30.8	49 51.6 O	9 31.0	7 41.2	27 35.1	74 49.3 Q
9	6 2.6	1 2.3	3 3.5	2 2.2	3 2.3	2 3.1	1 3.3	-	4 2.6	2 5.3	3 3.8	1 2.1	2 2.2	2 2.1	1 3.4	-	-	6 4.0
8	20 8.8	2 4.7	10 11.6	8 8.7	11 8.6	7 10.9	2 6.7	2 6.7	15 9.9	3 7.9	5 6.3	5 10.6	9 9.9	6 6.3	3 10.3	3 17.6	10 13.0	10 6.7
7	11 4.8	5 11.6 D	4 4.7	1 1.1	3 2.3	5 7.8	3 10.0	3 10.0	6 4.0	2 5.3	3 3.8	-	8 8.8	5 5.3	3 10.3	-	6 7.8	5 3.3
6	3 1.3	1 2.3	1 1.2	1 1.1	2 1.6	1 1.6	-	1 3.3	1 0.7	1 2.6	3 3.8	-	-	2 2.1	1 3.4	-	-	3 2.0
5	29 12.8	9 20.9 C	8 9.3	12 13.0	17 13.3	9 14.1	2 6.7	5 16.7	22 14.6 J	2 5.3	2 2.5	7 14.9 K	18 19.8 K	9 9.5	6 20.7	5 29.4 n	12 15.6	17 11.3
4	3 1.3	1 2.3	2 2.3	-	1 0.8	-	2 6.7	-	3 2.0	-	-	-	3 3.3	1 1.1	2 6.9	-	3 3.9	-
3	7 3.1	4 9.3 cd	1 1.2	1 1.1	4 3.1	3 4.7	-	3 10.0	4 2.6	-	1 1.3	1 2.1	5 5.5	4 4.2	-	1 5.9	2 2.6	5 3.3
<u>Bottom 2 Box (1-2)</u>	37 16.3	7 16.3	13 15.1	16 17.4	27 21.1 F	6 9.4	4 13.3	4 13.3	25 16.6	5 13.2	11 13.8	9 19.1	14 15.4	16 16.8	4 13.8	1 5.9	13 16.9	24 16.0

Comparison Groups: BCD/EPG/HIJ/KLM/NOP/QR

Independent T-Test for Means, Independent Z-Test for Percentages

Upper case letters indicate significance at the 95% level.

Lower case letters indicate significance at the 90% level.

MULTI -- Using a scale of 1 to 10, I'd like for you to tell me the degree to which you would prefer a single provider or multiple providers for your telephone services.

	TOTAL	AGE			HOUSEHOLD SIZE			MARITAL STATUS			EDUCATION			INCOME			GENDER	
		21-35	36-55	56+	1-2	3-4	5+	SINGLE	MARR-IED	DIV/WID SEP.	H.S.	TECH/ASSOC.	COLL. GRAD+	<\$50K	\$50K-<\$75K	\$75K+	MALE	FEM.
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)	(O)	(P)	(Q)	(R)
TOTAL	227	43	86	92	128	64	30	30	151	38	80	47	91	95	29	17	77	150
	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0
2	3	-	1	2	3	-	-	-	2	1	2	-	1	2	-	-	1	2
	1.3		1.2	2.2	2.3				1.3	2.6	2.5		1.1	2.1			1.3	1.3
1	34	7	12	14	24	6	4	4	23	4	9	9	13	14	4	1	12	22
	15.0	16.3	14.0	15.2	18.8 f	9.4	13.3	13.3	15.2	10.5	11.3	19.1	14.3	14.7	13.8	5.9	15.6	14.7
DON'T KNOW	10	2	5	3	4	4	1	1	7	1	1	4	4	1	-	-	4	6
	4.4	4.7	5.8	3.3	3.1	6.3	3.3	3.3	4.6	2.6	1.3	8.5 k	4.4	1.1			5.2	4.0
MEAN	7.08	5.95	7.36	7.37	6.77	7.42	7.52	6.59	6.98	8.05	8.13	6.88	6.41	7.26	6.62	7.24	6.63	7.31
STD. DEV.			B	B						hi	lm							
STD. ERROR	3.41	3.25	3.33	3.46	3.61	3.05	3.29	3.32	3.41	3.10	3.16	3.64	3.25	3.46	3.11	2.93	3.35	3.43
	0.23	0.51	0.37	0.37	0.32	0.39	0.61	0.62	0.28	0.51	0.36	0.56	0.35	0.36	0.58	0.71	0.39	0.29
No Answer	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Comparison Groups: BCD/EFG/HIJ/KLM/NOP/QR  
Independent T-Test for Means, Independent Z-Test for Percentages  
Upper case letters indicate significance at the 95% level.  
Lower case letters indicate significance at the 90% level.

ADVISE -- Which statement best reflects your opinion on being kept aware of the full range of telecommunications, information, and entertainment services that CBT will be able to offer?

	TOTAL	AGE			HOUSEHOLD SIZE			MARITAL STATUS			EDUCATION			INCOME			GENDER	
		21-35	36-55	56+	1-2	3-4	5+	SINGLE	MARR- IED	DIV/ WID SEP.	H.S.	TECH/ ASSOC.	COLL. GRAD+	<\$50K	\$50K- <\$75K	\$75K+	MALE	FEM.
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)	(O)	(P)	(Q)	(R)
TOTAL	227	43	86	92	128	64	30	30	151	38	80	47	91	95	29	17	77	150
	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0
1. I want to be advised of all telecommunications, information.	90	23	48	18	39	35	16	13	66	10	26	19	44	33	17	10	32	58
	39.6	53.5	55.8	19.6	30.5	54.7	53.3	43.3	43.7	26.3	32.5	40.4	48.4	34.7	58.6	58.8	41.6	38.7
		D	D			E	E		J				K		N	n		
2. I would prefer to be advised only of those that would benefit	95	18	26	47	58	24	11	14	65	13	36	15	38	46	7	5	33	62
	41.9	41.9	30.2	51.1	45.3	37.5	36.7	46.7	43.0	34.2	45.0	31.9	41.8	48.4	24.1	29.4	42.9	41.3
				C										O				
3. I do not want to be advised of any services offered.	41	2	11	27	31	5	3	3	20	15	18	13	9	16	5	2	11	30
	18.1	4.7	12.8	29.3	24.2	7.8	10.0	10.0	13.2	39.5	22.5	27.7	9.9	16.8	17.2	11.8	14.3	20.0
			b	BC	FG				HI		M	M						
4. DON'T KNOW/NO ANSWER	1	-	1	-	-	-	-	-	-	-	-	-	-	-	-	-	1	-
	0.4		1.2														1.3	
No Answer	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Comparison Groups: BCD/EFG/HIJ/KLM/NOP/QR  
Independent T-Test for Means, Independent Z-Test for Percentages  
Upper case letters indicate significance at the 95% level.  
Lower case letters indicate significance at the 90% level.

USEINFO -- Using a scale of 1 to 10, how concerned are you about having CBT use this type of information in order to better make you aware of new services or information?

	TOTAL	AGE			HOUSEHOLD SIZE			MARITAL STATUS			EDUCATION			INCOME			GENDER	
		21-35	36-55	56+	1-2	3-4	5+	SINGLE	MARR-IED	DIV/WID SEP.	H.S.	TECH/ASSOC.	COLL. GRAD+	<\$50K	\$50K-<\$75K	\$75K+	MALE	FEM.
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)	(O)	(P)	(Q)	(R)
TOTAL	227 100.0	43 100.0	86 100.0	92 100.0	128 100.0	64 100.0	30 100.0	30 100.0	151 100.0	38 100.0	80 100.0	47 100.0	91 100.0	95 100.0	29 100.0	17 100.0	77 100.0	150 100.0
<u>Top 2 Box (9-10)</u>	39 17.2	8 18.6	14 16.3	16 17.4	21 16.4	14 21.9	3 10.0	8 26.7	25 16.6	5 13.2	12 15.0	9 19.1	17 18.7	20 21.1	1 3.4	3 17.6	13 16.9	26 17.3
														O				
10=EXTREMELY CONCERNED	38 16.7	7 16.3	14 16.3	16 17.4	20 15.6	14 21.9	3 10.0	7 23.3	25 16.6	5 13.2	12 15.0	9 19.1	16 17.6	19 20.0	1 3.4	3 17.6	12 15.6	26 17.3
														C				
9	1 0.4	1 2.3	-	-	1 0.8	-	-	1 3.3	-	-	-	-	1 1.1	1 1.1	-	-	1 1.3	-
8	9 4.0	4 9.3	4 4.7	1 1.1	3 2.3	5 7.8	1 3.3	3 10.0	6 4.0	-	1 1.3	1 2.1	7 7.7	3 3.2	2 6.9	1 5.9	5 6.5	4 2.7
		d											K					
7	10 4.4	3 7.0	3 3.5	4 4.3	6 4.7	3 4.7	-	1 3.3	7 4.6	1 2.6	4 5.0	1 2.1	5 5.5	3 3.2	1 3.4	1 5.9	3 3.9	7 4.7
6	12 5.3	1 2.3	6 7.0	5 5.4	5 3.9	3 4.7	3 10.0	-	10 6.6	1 2.6	6 7.5	2 4.3	4 4.4	3 3.2	2 6.9	1 5.9	1 1.3	11 7.3
																		Q
5	32 14.1	5 11.6	13 15.1	14 15.2	16 12.5	14 21.9	2 6.7	6 20.0	20 13.2	6 15.8	9 11.3	13 27.7	9 9.9	12 12.6	4 13.8	-	10 13.0	22 14.7
						G						KM						
4	5 2.2	3 7.0	1 1.2	1 1.1	3 2.3	2 3.1	-	1 3.3	4 2.6	-	2 2.5	-	3 3.3	3 3.2	-	-	1 1.3	4 2.7
3	15 6.6	2 4.7	7 8.1	5 5.4	8 6.3	5 7.8	2 6.7	1 3.3	12 7.9	1 2.6	4 5.0	2 4.3	8 8.8	5 5.3	1 3.4	2 11.8	6 7.8	9 6.0
<u>Bottom 2 Box (1-2)</u>	101 44.5	17 39.5	37 43.0	43 46.7	63 49.2	18 28.1	19 63.3	10 33.3	66 43.7	22 57.9	40 50.0	19 40.4	37 40.7	43 45.3	18 62.1	9 52.9	36 46.8	65 43.3
					F		F			H								

Comparison Groups: BCD/EFG/HIJ/KLM/NOP/QR  
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